## GAINES, NOVICK, PONZINI, COSSU & VENDITTI, LLP 1133 Westchester Avenue, Suite N-202 White Plains, New York 10604 (914) 288-9595

**MEMO ENDORSED** 

April 21, 2020

## Via ECF

Honorable Denise L. Cote United State District Court Southern District of New York 500 Pearl Street New York, New York 10007

RE: Sierra v. Senior Whole Health, et al.: Case No. 19-cv-0273 (DLC)

Your Honor,

I hope that You and Your family are safe and well during these difficult times.

As Your Honor knows I represent Plaintiff Jeannette Sierra in the above referenced lawsuit. I write this letter to request an adjournment of the Telephone Conference set for April 24, 2020 at 10:00 AM, and an extension of time to submit pre-conference submissions and attendance acknowledgment forms, which are currently due no later than April 27, 2020 by 5:00 PM.

This is Plaintiff's first request for an adjournment of the Telephone Conference and Plaintiff's first request for an extension of time to submit pre-conference submissions. Defendants have consented to this request for an extension.

Plaintiff seeks this adjournment and extension because, while the Parties have started taking depositions, we have not been able to complete all depositions. The Parties have scheduled depositions in late May and early June with the hope that such depositions will be able to go forward, particularly in light of these challenging circumstances.

I thank Your Honor for Your time and consideration and hope that you continue to remain safe.

Respectfully submitted,

/s/ Jaazaniah Asahguii

Any request to adjourn the April 24, 2020 settlement conference in front of Magistrate Judge Lehrburger should be directed to him, unless it would require a modification of this Court's prior orders. Under the current Scheduling Order, Dkt. No. 59, settlement discussions must begin no later than May 2020.

April 22, 2020

DENISE COTE

United \$tates District Judge